

Douglas B. Lipsky

A N E M P L O Y M E N T L A W F I R M Application GRANTED. Defendant shall answer or otherwise respond to the Complaint by **October 4, 2021**. The initial pretrial conference scheduled for October 7, 2021, at 10:50 a.m. is adjourned to

November 18, 2021, at 10:50 a.m.

Dated: September 8, 2021 New York, New York 420 Lexington Avenue, Suite 1830 New York, New York 100170

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September 8, 2021

## VIA ECF

The Honorable Lorna G. Schofield, U.S.D.J. U.S. District Court for the Southern District of New York 40 Foley Square New York, New York 10007

Re: Nisbett v. Suitable Inc., 1:21-cv-6293 (LGS)

United States District Judge

Dear Judge Schofield:

This firm represents Plaintiff Kareem Nisbett in this website accessibility case under the Americans with Disabilities Act. We submit this joint request, on behalf of all parties, to extend Defendant's responsive pleading deadline and to adjourn the October 7, 2021, 10:50 a.m., Initial Pretrial Conference.

On August 13, Defendant was served with the Summons and Complaint, making its responsive pleading due by September 3, 2021. (Doc. No. 6). Defense counsel has since contacted this firm to discuss a possible early resolution and the need to obtain local counsel. To allow for these events to occur and to conserve resources, Defendant makes two requests: that Plaintiff consent to extend its responsive pleading deadline by 30 days; and that the October 7 Initial Pretrial Conference be correspondingly adjourned by 30 days. Plaintiff consents to these requests. The parties, therefore, respectfully request that Defendant's responsive pleading deadline be extended to October 4, 2021 and the conference be adjourned to a date after November 7.

This is the first request to extend these dates. We appreciate the Court's consideration of these requests.

Respectfully submitted, LIPSKY LOWE LLP

s/ Douglas B. Lipsky
Douglas B. Lipsky

CC: Hugo Lopez (Via email)